

1 | would be his prerogative to offer them and we would take it
2 | from there. I, I think the burden of, of proof in -- on these
3 | issues is with Mr. Kelly.

4 | JUDGE FRYSIAK: Well, I -- that's a valid point of
5 | view. I mean, I'm not saying that this is the ruling.

6 | MR. ZAUNER: Yeah. I'm just saying that I wasn't
7 | trying to trap the witness or anything by asking her whether
8 | or not she had a loan in place. And, and when she said she
9 | did, I asked her if she had documents to evidence that, and,
10 | and this is what is offered to me. And I'm just stating for
11 | the record that I, I don't consider these documents as, as, as
12 | proof of that fact.

13 | MR. KELLY: That's -- again, that's testimony.

14 | MR. ZAUNER: Well, the -- if the documents aren't --
15 | I just want the record to show why we didn't submit these
16 | documents or offer them. If they did show that I would offer
17 | them.

18 | MR. KELLY: Well, I want to state why I didn't offer
19 | them, and that is there is no financial issue in the case and
20 | I didn't want to risk creating a financial issue, you know,
21 | for, for flyspecking when I don't perceive there to be a
22 | financial issue in the case. I think the witness -- does the
23 | witness have a plan to put the station back on the air? She
24 | has and she does.

25 | MR. ZAUNER: Let, let me ask the witness this

1 question, get the case maybe rolling again, if I may?

2 JUDGE FRYSIK: Here's the quandary. The witness
3 says she has financing in place and she, she maintains that
4 she has documentation to prove it. She's entitled to have
5 that documentation in the record. Unless you want -- if you
6 don't want to challenge her on that, then she doesn't have any
7 need to do anything.

8 MR. ZAUNER: Well, I think, I think you're right.
9 She does have a right to have that in the record, and, and I
10 would ask if there is any such document and if counsel has
11 such documents, that he offer them into the record.

12 MR. KELLY: There's no financial issue in the case,
13 Your Honor.

14 JUDGE FRYSIK: Well, this is an unusual case.

15 MR. KELLY: It is an unusual case, and that's why
16 it's hard to know how to proceed --

17 JUDGE FRYSIK: Sure.

18 MR. KELLY: -- and the best way to protect your
19 client and not get in a position of volunteering information
20 that might add additional issues and additional expense. And,
21 you know, I --

22 JUDGE FRYSIK: The station --

23 MR. KELLY: -- you know --

24 JUDGE FRYSIK: The station here has been off the
25 air since September, I think. It's a question of whether this

1 person, who's already expended a lot of money, is now in a
2 position to be able to continue.

3 MR. KELLY: Well, here is my plan, Your Honor.

4 JUDGE FRYSIK: That is a legitimate concern in this
5 case. Okay?

6 MR. KELLY: This was, this was our plan, and I don't
7 mind sharing it. The Bureau -- because other parts of the
8 Bureau are going to have to deal with this. There is no
9 financial issue in the case. We go through -- offer the
10 witness for cross-examination, offer what evidence we have.
11 At the conclusion of the case we're going to go to the other
12 -- the, the AM branch. We're going to seek an STA to put the
13 station back on the air. We will present to them what plans
14 we have to get the station back on the air and get an STA.
15 When the station -- when the STA is granted and the station
16 goes back on the air, that seems to obviate this. That's why
17 it is an unusual case and that's why I did not want to get
18 involved with a financial issue. When, you know, there, there
19 is really no adversary and there's no reason for this to be
20 adversarial. That's why I have proceeded in this fashion. I
21 think it's an appropriate, you know, an appropriate means to
22 proceed.

23 MR. ZAUNER: One moment, Your Honor. Your Honor, I
24 believe -- I, I don't have a copy of your order adding the
25 issues, but one of the issues that you added was to determine

1 whether Pine Tree has the capability and intent to expedi-
2 tiously resume broadcast operations of KARW AM consistent with
3 the Commission's rules, and I think that this question goes
4 directly to that point. And I think that if, that if Mr.
5 Kelly has --

6 MR. KELLY: Judge, is there an -- is there a written
7 order? Because I do not have one in, in the files I've
8 received.

9 JUDGE FRYSIK: You know, I -- we --

10 MR. KELLY: You know, I can only be on notice of
11 what I have actual notice of. I -- you know.

12 JUDGE FRYSIK: Well, I alluded to that yesterday
13 when I indicated to you that the release date of my order was
14 March 2, 1995.

15 MR. KELLY: May, may I -- I'm sorry. If I could ask
16 your indulgence, Your Honor, could I see a copy of the, the
17 order?

18 JUDGE FRYSIK: Well, you can see my, my file.

19 MR. KELLY: Please?

20 JUDGE FRYSIK: This is my judicial file.

21 MR. KELLY: I don't mean to look at anything that I
22 can't look at, but I'd just like to see what the, what the
23 actual order -- what the order is -- what the, what the issue
24 is framed --

25 (Pause.)

1 MR. KELLY: You have -- would the Bureau object if I
2 were to put these -- I have no problem putting these in the,
3 in the record. I don't. I -- and with the Bureau -- I have
4 sufficient copies. We can put these, we can put these items
5 in the record and they can stand for what they stand for.

6 MR. ZAUNER: Yeah, that would be fine.

7 MR. KELLY: The problem is, you know --

8 JUDGE FRYSIK: All right. Why don't you identify
9 them?

10 MR. KELLY: Thank you, Your Honor. Let me -- give
11 me just a second here and I will --

12 (Pause.)

13 MR. KELLY: These items have been provided to the
14 Bureau, Your Honor, and I will -- I will provide them to you.

15 JUDGE FRYSIK: All right. What do you have --

16 MR. KELLY: The first document -- I have three
17 documents.

18 JUDGE FRYSIK: Yes.

19 MR. KELLY: The first is a document on the stationery of something called Citizens Mortgage, Inc., of Phoenix, Arizona. It is signed by Corliss Ford, Loan Officer. It is addressed to Your Honor and dated March 20, 1995. It's a letter. I'll hand a copy to Your Honor. Ask that this item be marked for identification as Praise No. 9.

25 JUDGE FRYSIK: That may be marked.

1 (Whereupon, the document referred to
2 as Praise Media Exhibit No. 9 was
3 marked for identification.)

4 MR. KELLY: The next item, Your Honor, and I've
5 handed this to the Bureau already, a two-page document. It
6 says at the top ICB Surety Group Letter of Confirmation, dated
7 February 27, 1995. I'll give two copies to the court reporter
8 and ask that this be marked for identification as Praise
9 No. 10.

10 JUDGE FRYSIK: That may be marked.

11 (Whereupon, the document referred to
12 as Praise Media Exhibit No. 10 was
13 marked for identification.)

14 MR. KELLY: Lastly, Your Honor, a one-page letter on
15 the stationery of something called All, A L L, Financial
16 Services of Manhattan Beach, California, addressed to Citizens
17 Mortgage, Inc., signed by somebody named -- looks like Don
18 Stephenson, S T E P H E N S O N. And I give two copies to the
19 court reporter and ask that this be marked for identification
20 as Praise Exhibit No. 11.

21 JUDGE FRYSIK: Yes. It may be marked.

22 (Whereupon, the document referred to
23 as Praise Media Exhibit No. 11 was
24 marked for identification.)

25 MR. KELLY: Okay. Thank you, Your Honor. I would

1 ask that these be accepted into evidence on the grounds that
2 these represent the plans that this applicant has, has made to
3 get the station back on the air.

4 MR. ZAUNER: We have no objections.

5 MR. KELLY: All right.

6 JUDGE FRYSIK: Receive, receive Exhibits 9, 10, and
7 11.

8 (Whereupon, the documents marked for
9 identification as Praise Media
10 Exhibit Nos. 9, 10, and 11 were
11 received into evidence.)

12 MR. KELLY: Thank you for your indulgence, Your
13 Honor.

14 MR. ZAUNER: Just for my information, Mr. Kelly,
15 Exhibit 9 is, is the March 20th letter?

16 MR. KELLY: That's correct. And 10 is ICB. 11 is
17 All.

18 MR. ZAUNER: Your Honor, may I approach the witness?

19 JUDGE FRYSIK: Yes.

20 MR. ZAUNER: Mrs. Washington, I don't know whether
21 you've seen these documents or not, but would you just take a
22 look at them for a moment? These are -- and let the record
23 show I'm showing Mrs. Washington Praise Exhibits 9, 10, and
24 11.

25 (Pause.)

1 MR. ZAUNER: You have had a chance to review these?

2 WITNESS: Yes, sir.

3 MR. ZAUNER: Are there any documents other than
4 these on which you are -- which would evidence your ability to
5 place the station back on the air if your license was to be
6 granted for this proceeding?

7 MR. KELLY: I'm going to, I'm going to object to the
8 question as vague. I think if -- you know, what, what is --
9 what are -- what is counsel driving at?

10 MR. ZAUNER: Whether there any other documents
11 besides these upon which Ms. Washington is relying to put the
12 station back on the air.

13 JUDGE FRYSIK: Do you understand the question?

14 WITNESS: Yeah. Are there any other documents?
15 I've basically got a confirmation from the loan officer and
16 the gentleman -- a verbal confirmation -- that I will get the
17 loan. And if --

18 MR. ZAUNER: I move to strike the answer as
19 unresponsive. My question is are there any documents other
20 than these, documents other than these --

21 WITNESS: I don't have any other documents.

22 MR. KELLY: I oppose the motion to strike. I mean,
23 it is responsive to the issue.

24 JUDGE FRYSIK: All right. Motion is granted. The
25 question referred to documentation, not to any oral

1 | declarations.

2 | WITNESS: I didn't know those documents were
3 | necessary.

4 | MR. KELLY: That's okay. There's no question
5 | pending.

6 | BY MR. ZAUNER:

7 | Q Other than the money that's -- would be represented
8 | from the loan that's contemplated by these documents, and that
9 | is Praise Exhibit 9, 10, and 11, do you have any other monies
10 | set aside to put the station back on the air?

11 | A I have some monies that I can get.

12 | Q Do you have any money that is, that is an escrow
13 | account, for example, to put the station back on the air?

14 | A No, but I do have some monies that I can get.

15 | Q What is -- could you tell us what that money is?
16 | You say you, you do have other monies to put the station back
17 | on the air.

18 | A Yes. I have a friend that has six radio stations
19 | and he would be willing to assist -- he owns six radio sta-
20 | tions -- and he would be willing to assist me in getting the
21 | station back on the air. But the information that you have
22 | there, that money will be readily made available.

23 | Q That would be your primary source of funding to put
24 | the station back on the air, that's the money that's repre-
25 | sented by Exhibits 9, 10, and 11?

1 A I'd prefer to -- yes.

2 Q How much of a loan are you seeking in 9, 10, and 11?

3 A Well, I was seeking 150,000, but they have granted
4 me half a million if I need it. IBC Surety.

5 Q No, the only -- again, I move to strike. The only
6 question was: how much money were you seeking in -- from the
7 documents that were Exhibit 9, 10, and 11. And she answered
8 150,000. And that should have been the end of the answer.

9 A Okay.

10 MR. KELLY: Well --

11 MR. ZAUNER: I mean, I ask a question and the
12 witness doesn't --

13 MR. KELLY: You know, you can't -- you know, you got
14 an answer you don't like. You know, that's not a proper
15 objection.

16 MR. ZAUNER: But it wasn't, it wasn't -- you know,
17 if I ask what time it is and somebody tells me where they went
18 on vacation, it's an unresponsive answer.

19 WITNESS: Well, I'm trying to answer it as clearly
20 and as responsive --

21 JUDGE FRYSIK: Well, I'm going to grant the motion
22 because -- if you want to develop that you have 500,000, your
23 counsel can do it.

24 MR. ZAUNER: Thank you, Your Honor.

25 (Pause.)

1 MR. ZAUNER: With regard to this individual loan to
2 fix broadcast stations, has he given you anything in writing
3 indicating his willingness to provide you with the money that
4 you might need to put the station back on the air?

5 WITNESS: No, he hasn't, and the reason being
6 because of -- I don't know where -- I didn't know where -- no,
7 he hasn't.

8 JUDGE FRYSIK: I didn't hear the last part.

9 WITNESS: Because of the --

10 MR. ZAUNER: Problems with the license?

11 WITNESS: -- situation with -- right.

12 BY MR. ZAUNER:

13 Q And, and it is your intent that you will not put the
14 station back on the air until this question of the license is
15 resolved, is that correct?

16 A No. I would like to put it back on the air.

17 Q But you wouldn't be able to get this money until the
18 question of the license is resolved, is that correct?

19 A No. That's not -- that what I am saying is that I
20 have put so much money into the station and I would like to
21 put -- get it back on the air and get it working, because if
22 it's dead it's not serving the community and it's not serving
23 me.

24 Q Well, why haven't you put it on -- back on the air
25 before this point in time?

1 A Because my signal sounds like -- it's distorted and
2 I would have to get new equipment, which is going to cost me
3 quite a bit of money.

4 Q And, and you're unwilling to spend that money as
5 long as this license is still in question, is that not
6 correct?

7 A Well, if I spend that money and then for some
8 reason, which I hope don't happen, you decide not to give me
9 my license, then what would I do with my equipment. And I
10 have spent that money and I have to pay it back. And I'm a
11 single mother with a six-year-old.

12 Q So, then the answer really is that you're not going
13 to put more money into the station until you're sure where the
14 license stands, is that correct? Is that your testimony?

15 MR. KELLY: Her testimony -- you know, that's
16 argumentative, Your Honor, and I object. Her testimony is her
17 testimony.

18 JUDGE FRYSIK: Well, it's a clarification of her
19 testimony. I -- that's the way I interpreted her testimony.
20 If it's different then she should tell me, because that's the
21 way I read it.

22 WITNESS: Well, in order to get my station back on,
23 I'm going to have to spend, right off the top, \$30,000. Okay.
24 That's \$30,000 that me, as a single mother, can use. Okay.
25 And if you say for some reason: I'm not going to give you the

1 license, then I've lost that \$30,000 and I'm going to have to
2 find a job and I'm going to have to support my child. I, I
3 have no problem with, with getting the station back on the air
4 and running the station and getting things in order, but I
5 have a difficult time with getting reliable people if they
6 don't know if they're going to be there next week or next
7 month.

8 BY MR. ZAUNER:

9 Q Well, then what you're saying, and I'll repeat my
10 question, is that --

11 A The FCC is holding my life in their hands. That's
12 what I'm saying.

13 Q What, what you're saying is that, that you're not
14 going to go back on the air until this question of the license
15 is resolved, you're not going to put the \$30,000 in that's
16 necessary to get the station operating again until you're sure
17 that the license is clear?

18 A I don't have \$30,000 to give --

19 Q Is that correct or incorrect, what I, what I stated?

20 MR. KELLY: The witness may answer. I have no
21 objection.

22 WITNESS: I guess that's correct, because I don't
23 have \$30,000 just to use it.

24 JUDGE FRYSIK: In other words, you would have to
25 borrow the 30,000 to put it back on?

1 WITNESS: Yes.

2 JUDGE FRYSIAK: All right.

3 WITNESS: And I would have to pay it back anyway.

4 BY MR. ZAUNER:

5 Q Do you have any separate money to refurbish the
6 station?

7 A Yes.

8 Q And is, and is that money in, in a special account
9 or anything?

10 A It's an individual that holds that money.

11 Q And that's somebody who said they will loan you this
12 money if you get your license renewed?

13 A Yes.

14 Q And, and who is that individual?

15 A Bishop Noel Jones, Bishop Teller, Mr. Grant.

16 Q These religious leaders have said that they will
17 assist you financially if the station gets back on the air?

18 A Right. Reverend Jerald. Not to mention Kent Trust
19 (phonetic sp.).

20 Q How much do you estimate you need to put the station
21 back on the air?

22 A To put it -- just to get it running, I'm going to
23 need \$30,000.

24 Q And to get it running with this automated system
25 that you're talking about, would that cost you additional

1 money?

2 A No. The \$30,000 would take care of the equipment
3 and get the ABC automation together.

4 JUDGE FRYSIK: What does the 150,000 represent?

5 WITNESS: I'm going to have -- the grounding system
6 has been there for such a long time, and I have to clean my
7 signal up, and just the equipment has been there since 1948.
8 So, all new equipment.

9 MR. ZAUNER: May I approach the witness?

10 JUDGE FRYSIK: Yes.

11 BY MR. ZAUNER:

12 Q I'm going to show you a copy of Mass Media Bureau's
13 exhibits. I'm going to begin with Exhibit 1. And I'm going
14 to show you a copy of what appears to be a license renewal for
15 KLGW. Can you identify KLGW?

16 A Yes.

17 Q Is that the predecessor to KARW in call letters?
18 That's --

19 A That's --

20 Q -- the same station but with old call letters?

21 A Yes, sir.

22 JUDGE FRYSIK: What are you showing --

23 MR. ZAUNER: This is Broadcast Bureau Exhibit 1,
24 attachment 1.

25 JUDGE FRYSIK: Attachment 1?

1 MR. ZAUNER: Um-hum.

2 BY MR. ZAUNER:

3 Q Do you know who Ken Tuck is, looking at the first
4 page of that attachment?

5 A I have no idea.

6 Q Let me call your attention to the second page of
7 that attachment, attachment, which is page 8 of the exhibit.
8 There there appears to be a signature by one Robert D. Murray.
9 Do you know who Robert D. Murray is?

10 A I don't really know him. I've talked with him.

11 Q Over the telephone?

12 A Yes.

13 Q And that is dated -- this license renewal form is
14 dated August 11, 1990. Did you have anything to do with the
15 filing of that renewal?

16 A No. I wasn't -- I didn't know about the station
17 then. I mean, the people going on with that.

18 Q Before your involvement with this proceeding, have
19 you ever seen this document before?

20 A No, sir.

21 Q I'm going to show you attachment 2, a trustees --
22 Notice of Trustees Sale. Have you ever seen this document
23 before? Do you know anything about it?

24 A No, sir.

25 JUDGE FRYSIK: That's attachment 3 in my -- I have

1 attachment 3, Notice of Trustees Sale.

2 MR. ZAUNER: I have -- it is attachment 2, can we
3 just check --

4 JUDGE FRYSIK: Attachment 2 I have as the Transfer
5 of Lien.

6 MR. ZAUNER: And I have that as -- it's reversed --
7 as, as Attachment 3. I think the important thing is what does
8 the court reporter's copies show, because hers are the ones
9 that are going to be the official record. Yes.

10 MR. SCHONMAN: Attachment 2 is the Notice of
11 Trustees Sale and Attachment 3 is the Transfer of Lien.

12 MR. ZAUNER: That's what I have in front of the
13 witness.

14 JUDGE FRYSIK: All right.

15 BY MR. ZAUNER:

16 Q Okay. Let me call your attention to attachment 3,
17 page -- beginning on page 13 of this exhibit. This is a
18 Transfer of Lien dated May 17, 1990, and have you ever seen
19 this document before?

20 A No, sir.

21 Q Did you have anything to do with the Transfer of
22 Lien that's referenced in this document?

23 A No, sir.

24 Q Let me show you attachment 4, which is a Trustees
25 Deed. And -- there's a date, executed May 17, 1990. Have you

1 ever seen this document before?

2 A No, sir.

3 Q Are you in any way familiar with the transaction
4 that it represents?

5 A No, sir.

6 Q Let me call your attention to page 19 of this
7 exhibit, which is still part of attachment 3. There's an
8 Affidavit of Foreclosure, Posting, and Mailing at page 19.
9 This is dated November 30th -- oh, I'm sorry. This is dated
10 August 6, 1991. Have you ever seen this document before?

11 A No, sir.

12 Q Did you have anything to do with the Affidavit of
13 Notice, Preparation -- Affidavit -- I'm sorry, withdraw that
14 -- Affidavit of Foreclosure, Posting, and Mailing?

15 A No.

16 Q Do you know anything about the transaction that's
17 referenced herein?

18 A No.

19 Q I'm going to call your attention to attachment 5, a
20 memorandum dated February 10, 1992. This is between Herbert
21 Wren and Earl Jones, Jr. It bears, among other things, the
22 signature of Eugene Washington. I'm going to ask you if this
23 document relates to your -- the purchase by Praise Media,
24 Inc., of Station KARW?

25 A Yes.

1 Q I notice that perhaps conspicuous by its absence is
2 your signature from this transaction. Can you tell us how it
3 came to be that Eugene Washington and Ray Lee Williams signed
4 the document?

5 A I was at work that day.

6 JUDGE FRYSIK: I didn't hear the question --

7 WITNESS: I was at work.

8 JUDGE FRYSIK: Well, you were also at that time a
9 director and secretary-treasurer, were you not?

10 WITNESS: That's correct.

11 BY MR. ZAUNER:

12 Q Are you familiar with this document? Have you seen
13 it before?

14 A Yes, sir.

15 Q And when did you first see the document?

16 A I think it was like a month after.

17 Q A month after it was executed?

18 A Right.

19 Q Okay. Let me call your attention to the bottom
20 page, page 23 of our exhibit, still part of attachment 5.
21 Have you seen this Warranty Deed before?

22 A Yes, sir.

23 Q Okay. And when did you see that?

24 A The same time.

25 Q About a month after the transaction was completed?

1 A Yes, sir.

2 Q And is the same thing true with the Deed of Trust
3 that's on page 26?

4 A Yes, sir.

5 Q Still part of attachment 5. And again, looking at
6 page 30, and this bears the signature of Eugene Washington and
7 Ray Lee Williams. Did you -- did -- let me withdraw that.

8 Is this the signature of Eugene Washington, do you
9 know?

10 A Yes. Yes, it is.

11 Q And, and I'm showing you the signature on page 30.
12 I'm also going to ask about the signature on, on page 22. Is
13 that the signature of Eugene Washington?

14 A Yes.

15 Q And you're familiar with the signature of Eugene
16 Washington?

17 A Yes.

18 Q The same thing with regard to Ray Lee Williams on
19 page 22. Is that Ray Lee Williams' signature?

20 A I'm not really sure.

21 Q Okay. Now, at the time that the February 10, 1992,
22 transaction was completed, did you make any attempts to report
23 the fact that you had acquired the station to the Federal
24 Communications Commission?

25 A At the time that they signed that document?

1 Q Yes. Had, had there been any notice to the Federal
2 Communications Commission that the license for KARW, at the
3 time it was KLGW, was to be transferred?

4 A Not to my knowledge. They, they went to Texarkana
5 to --

6 JUDGE FRYSLAK: Who is "they"?

7 WITNESS: Eugene and Ray Lee Williams.

8 JUDGE FRYSLAK: Did they have communications counsel
9 representing them?

10 WITNESS: No.

11 JUDGE FRYSLAK: Did they have any counsel repre-
12 senting them?

13 WITNESS: No, sir.

14 BY MR. ZAUNER:

15 Q As of February 10, 1992, had you paid any money --
16 when I say "you" I'm referring to Praise Media -- paid any
17 money to Herbert Wren and Earl Jones?

18 A Yes.

19 Q And, and when was the first such payment?

20 A Before February the 10th we had paid the \$6,000 for
21 the good faith money. I, I paid that.

22 Q When you say you paid that, out of your own money or
23 was that money that came from Mr. Washington?

24 A No. It was my money.

25 Q Did Ray Lee Williams contribute any money to that

1 6,000?

2 A No.

3 Q At the time of the memorandum and agreement, was any
4 monies paid to Mr. Herbert Wren and Earl Jones? There was
5 \$6,000 before and then they came to the meeting to sign the
6 papers on February 10th. Did they bring -- did Mr. Washington
7 and Mr. Williams bring any money with them to that meeting?

8 A I believe Eugene brought \$10,000, because Mr.
9 Williams didn't have any money.

10 Q Did, did Mr. Williams contribute any money at that
11 time?

12 A No.

13 Q What is the basis of your information that Mr.
14 Williams did not contribute any money at that time?

15 A Because he had told me he didn't have any money and
16 I needed to try to get the money, and that's when I called
17 Eugene.

18 Q Did Eugene ever confirm to you that he had put up
19 the entire 10,000?

20 A Yes.

21 Q As of February 10, 1992, who were the shareholders
22 in Praise Media, Inc.?

23 A We had not issued shares.

24 Q Well, what was your understanding of what percentage
25 of the business was to be owned by whom? Were you to have an

1 interest in the business?

2 A I was going to have 15 percent interest.

3 Q 15 percent?

4 A That's correct.

5 Q Okay. And Eugene was to have?

6 A 60 percent.

7 Q Okay. And who was to have the remaining 25 percent?

8 A Ray Lee Williams, providing he came up with this
9 money.

10 Q And that was conditioned upon his coming up with,
11 with money?

12 A That's correct.

13 JUDGE FRYSIK: Mr. Zauner, it's the noon hour. Is
14 it a good time to break? I hate to interrupt you.

15 MR. ZAUNER: One last question.

16 JUDGE FRYSIK: All right, then we'll break.

17 BY MR. ZAUNER:

18 Q Was there a Mr. Ronald O'Neill who was to have an
19 interest in the station at this time?

20 A Well, I only know what is -- on our charter as
21 secretary, I believe.

22 Q Was he to have a stock interest?

23 A I think he was mentioned, but I don't think he was
24 really interested in having stock.

25 MR. ZAUNER: No further questions at this time.

1 JUDGE FRYSIAK: Let's take a lunch recess, be back
2 at 1:30.

3 (Whereupon, at 12:00 p.m the lunch recess ensued.)
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A F T E R N O O N S E S S I O N

(1:30 p.m.)

JUDGE FRYSIAK: All right. We're back on the record. Any preliminary matters?

MR. KELLY: No, Your Honor.

MR. ZAUNER: No, Your Honor.

JUDGE FRYSIAK: Mr. Zauner?

BY MR. ZAUNER:

Q Mrs. Washington, on -- isn't, isn't it a fact that on February 10, 1992, when Praise Media took over the operation -- or, or signed the documents which transferred the station to Praise Media that Praise Media was made aware by Herbert Wren and Earl Jones that they were not warranting the transferability of the title to the -- of the license?

A No.

Q Well, didn't they in fact put that in their memorandum of February 10, 1992? And let me show you that document.

MR. KELLY: Can you, can you just tell me where it is again?

MR. ZAUNER: Yes. That's -- of course.

MR. KELLY: Attachment --

MR. ZAUNER: It's attachment 5 --

MR. KELLY: Attachment 5.

MR. ZAUNER: -- and it's the first page.